Commonwealth of Kentucky Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: Ibrahim AL-Burai

| GENERAL INFORMATION: | | |
|---------------------------------------|--|--|
| Name: | Duro Standard Products Company, Inc. | |
| Address: | 7600 Empire Drive | |
| | Florence, Kentucky 41042 | |
| Date application received: | 1/30/2007 | |
| SIC Code/SIC description: | 2674, Uncoated Paper and Multiwall Bags | |
| Source ID: | 21-015-00019 | |
| Source A.I. #: | 174 | |
| Activity ID: | APE20070002 | |
| Permit: | F-04-020 R2 | |
| APPLICATION TYPE/PERMIT ACTIVITY: | | |
| [] Initial issuance | [] General permit | |
| [X] Permit modification | [X] Conditional major | |
| Administrative | Title V | |
| X Minor | Synthetic minor | |
| Significant | [] Operating | |
| [] Permit renewal | [X] Construction/operating | |
| COMPLIANCE SUMMARY: | | |
| [] Source is out of compliance | [] Compliance schedule included | |
| [] Compliance certification signed | i | |
| APPLICABLE REQUIREMENTS LIST: | | |
| [] NSR [] N | ISPS [X] SIP | |
| []PSD []N | VESHAPS [] Other | |
| [] Netted out of PSD/NSR [] N | Not major modification per 401 KAR 51:001, 1(116)(b) | |
| MISCELLANEOUS: | | |
| [] Acid rain source | | |
| [] Source subject to 112(r) | | |
| [X] Source applied for federally en | <u>*</u> | |
| [] Source provided terms for alter | native operating scenarios | |
| [] Source subject to a MACT stan | dard | |
| [] Source requested case-by-case | 112(g) or (j) determination | |
| [] Application proposes new cont | rol technology | |
| [X] Certified by responsible official | al | |
| [] Diagrams or drawings included | | |
| [] Confidential business informati | ion (CBI) submitted in application | |
| [] Pollution Prevention Measures | | |
| [X] Area is non-attainment (list po | llutants): Basic Non- Attainment Ozone | |
| | | |

EMISSIONS SUMMARY:

| Pollutant | Projected Actual (TPY) | Allowable (TPY) | Potential (TPY) |
|------------|---------------------------|-----------------|--------------------|
| VOC | 20 | 20 * | 20 |
| Single HAP | <9 | <9 * | <9 |

• Conditional Major Emission Limitations – No change with Revision 2

MINOR PERMIT REVISION FOR REPLACEMENT AND ADDITION OF PRESSES, (F-04-020 R2):

The source is replacing press M05 (#20181) with a similar size and capacity (20166), and adding a new press M25(#20181) with two printers with this revision. Also one printer M10 (#20126) has been removed so that the facility total will remain 53 presses following the new construction. Existing source-wide permit emission limitations will not need to be revised. Duro plans to continue operating below the emission caps, therefore the source-wide PTE has not changed.

MINOR PERMIT REVISION; REPLACEMENT AND ADDITION OF PRESSES, (F-04-020 R1):

The source is replacing (2) two product and packaging flexographic presses with (2) presses of similar size and capacity, and adding (4) four additional flexographic presses with this revision. Also several of the existing presses have been removed so that the facility total will now be 53 presses following the new construction. Existing sourcewide permit emission limitations will not need to be revised. Duro plans to continue operating below the emission caps, therefore the sourcewide PTE has not changed.

Since the original permit issuance, Boone County has been reclassified as non-attainment for ozone. The original sourcewide permit had the presses divided into two sections of the permit, between those presses that were constructed when Boone county was non-attainment for ozone and therefore subject to 401 KAR 59:212, and those presses that were constructed when Boone County was in attainment for ozone. Now that Boone County is basic nonattainment for ozone, all presses are subject to 401 KAR 59:212.

Also the regulation 401 KAR 59:185 has been revised since permit issuance, so the new requirements from this regulation are being added to the permit.

SOURCE DESCRIPTION:

The source manufactures paper bags to which an image is applied (type and art). Wide-web flexographic presses used to apply images are the primary source of emissions from this facility. Currently there are (61) flexographic presses. There are also (2) parts cleaners classified as insignificant activities and (2) facility boilers, (59:015).

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

Operating limitations shall be, VOC emissions no more than 20 TPY and single HAP emissions no more than 9.0 TPY.

OPERATIONAL FLEXIBILITY:

Duro Standard is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.